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June 14, 2023

VIA CM/ECF

Honorable Thomas I. Vanaskie,
Special Master
Stevens & Lee, P.C.
1500 Market Street, East Tower
18th Floor
Philadelphia, Pennsylvania 19103

**RE: *In re Valsartan, Losartan, and Irbesartan Products Liability
Litigation, No. 1:19-md-02875***

Dear Judge Vanaskie:

I am writing on behalf of counsel for the ZHP defendants, Teva and Torrent (“defendants”), as well as counsel for plaintiffs (all of whom are copied on this letter), as a follow-up to the parties’ discussion with the Court at the May 17, 2023 Case Management Conference regarding a briefing schedule for motions to seal materials submitted in connection with the parties’ *Daubert* briefing as well as earlier submissions related to the Court’s most recent order on confidentiality designations.

Over the past several weeks, counsel for defendants have been diligently conferring with plaintiffs’ counsel regarding confidentiality issues raised by certain exhibits to the *Daubert* briefing. Those discussions have yielded a number of compromises that have limited the need for Court intervention. Counsel for defendants and plaintiffs agree that it would be productive to continue such discussions in an effort to further narrow (or possibly eliminate) the issues to be

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brought before the Court. Accordingly, the parties are agreeable to extending the deadlines previously discussed with the Court as follows:

- Defendants to file motions to seal by July 10, 2023.
- Plaintiffs to file opposition briefing by July 31, 2023.
- Defendants to file reply briefs by August 7, 2023.

Thank you for your consideration.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Cox', with a stylized flourish at the end.

Christopher Cox

Cc: Layne Hilton
Christopher Geddis
Steven Harkins
Brittany Nagle